

JAMEL GODDARD  
 USM# 79379-054  
 USP BIG SANDY  
 USP, PO BOX 2068  
 INEZ, KY 41224

MOTION TO STAY  
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UNITED STATES DISTRICT COURT  
 FOR THE SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA, :  
 :  
 : CIVIL CASE NO. 22-CV-3288(LAP)  
 vs. :  
 : CRIMINAL CASE NO. 17-CR-0439(LAP)  
 :  
 : MOTION TO STAY THE PROCEEDINGS AFTER  
 JAMAL GODDARD, :  
 : THE FILLING OF MOTION PURSUANT TO:  
 :  
 : TITLE 28, U.S.C. § 2255  
 Petitioner/Defendant. :

\* \* \* \* \*

MOTION TO STAY PROCEEDINGS AFTER FILLING OF MOTION  
PURSUANT TO TITLE 28, U.S.C. § 2255

COMES NOW the Petitioner/Defendant, JAMAL GODDARD, USM# 79379-054, in Pro Se, in necessity, and hereby Moves this Honorable Court to Issue an Order granting a Stay of proceedings of Case No. 22-CV-3288(LAP)-Criminal Case No. [17-CR-0439(LAP)], after Motion to vacate, set aside, or correct sentence pursuant to 28, U.S.C. § 2255, has been docketed on the Court Docket on Case stated above [22-CV-3288(LAP)], in the alternative to Issue an Order granting a ninety (90) day extension of time to obtain Defendant GODDARD Case/Work Files from Criminal Case Counsel Florian Miedel or Counsel Jesse Siegel, Legal Meno's from Correctional Staff at U.S. Penitentiary Big Sandy in relation to lockdown of Facility for security reason's [Gang roitting, Staff Shortage because the Criminal Indictments being filed agaainst Correctional Officers for beatings of prisoners at this Facility (Fourty(40) Corr. Officers), which have created a shortage in Corr. Staff and Defendant GODDARD has been unable to obtain his legal property to completely respond to Courts Order dated; April 26, 2022, Case No. 22-CV-3288(LAP), also Defendant/Petitioner GODDARD will need a Memo from USP BIG SANDY Staff in relation to COVID-19 lockdowns at this Facility to show cause why the Motion [2255] should not be denied as untimely.

*Mr. goddard's proceedings are stayed until September 30. He shall report to the Court by letter before that date as to status*  
 6/29/22

DO ORDERED

*Louisa A. Fewska*

LOUISA A. FEWSKA  
 UNITED STATES DISTRICT JUDGE

The Defendant/Petitioner has just recently discovered several Constitutional violations in the criminal process that produced his Conviction/Sentence and wishes to file a correct and complete request for relief, in Good Faith, pursuant to Title 28, U.S.C. § 2255.

The Defendant/Petitioner currently has no other choice but to represent himself in pro se, with the assistance of law library prison clerks, in necessity. The Defendant/Petitioner GODDARD and the law library clerk [prisoner] have no training in the field of law and need the additional time to research his recent discovery.

The Defendant/Petitioner has access to a limited law library as it contains 3 computes to facilitate 1345 inmates here at USP BIG SANDY. What's more, after waiting his turn, the Defendant/Petitioner is limited to only two(2) hours to research and then must wait his turn again.

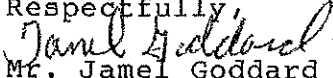
This motion is made in Good Faith, in the Interest of Justice, and not meant to delay the proceedings. The United States nor any other adverse party will be prejudiced by an Order to Stay proceedings and/or a Ninety(90) day delay.

I, Jamel Goddard, declare under penalty of perjury, pursuant to Title 28, U.S.C. § 1746, that the above stated facts and True and Correct to the best of my knowledge and belief.

WHEREFORE NOW, above premises considered, the Defendant/Petitioner Jamel Goddard, USM# 79379-054, Moves this Honorable Court to GRANT him and/or Issue an Order of Stay and/or in the alternative to Issue an Order granting a ninety(90)day extension of time inwhich to file, with supporting documentation, motion pursuant to Title 28, U.S.C. § 2255.

Also, review herein submitted motion or petition for Issue of an Order for the Case/Work Files for Defendant/Petitioner Jamel Goddard.

Dated: June 20, 2022  
Inez, Kentucky

Respectfully,  
  
Mr. Jamel Goddard  
USM# 79379-054

CERTIFICATE OF SERVICE

MOTION TO STAY PROCEEDINGS/POST-CONVICTION RELIEF

I, the undersigned, do hereby certify that I have served an Original and a copy of this Motion [28 U.S.C. § 2255] upon the Clerk of this Court, via U.S. mail, properly addressed, First-Class postage prepaid, placing into the internal mailing system as made available to inmates for legal mail, at the USP BIG SANDY, P.O. BOX 2068, INEZ, KY 41224. The Petitioner/Defendant further request that a copy of this [his] pleading be forwarded to all interested parties via the CM/ECF system, as he is detained, indigent, and has no other means.

Done This 23<sup>rd</sup> Day of June, 2022

*Jamel Goddard*  
Respectfully Submitted,

Mr. Jamel Goddard  
Pro Se Litigant  
USM# 79379-054  
USP BIG SANDY  
USP, P.O. BOX 2068  
INEZ, KY 41224

